

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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**WILMINGTON TRUST, NATIONAL ASSOCIATION, AS  
TRUSTEE FOR THE BENEFIT OF THE REGISTERED  
HOLDERS OF COREVEST AMERICAN FINANCE 2020-1  
TRUST MORTGAGE PASS-THROUGH CERTIFICATES**

Plaintiff,

**-VS-**

**ANSWER**

Case No.: 23-CV-6662

**HIRSCHHORN ESTATES LLC, MEYER HIRSCHHORN,  
CITY OF ROCHESTER and JOHN DOE NO I  
THROUGH JOHN DOE NO. XXX, inclusive, the  
last thirty names being fictitious and unknown to  
plaintiff, the persons or parties intended being the  
tenants, occupants, persons or corporations, if any  
having or claiming an interest in or lien upon the  
premises described in the complaint.**

Defendants.

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Defendant, City of Rochester, ("City Defendant") by their attorney Patrick Beath,  
City of Rochester Corporation Counsel, Michael Furlano, Esq. of Counsel, hereby  
answers the Complaint as follows:

1. City Defendant admits paragraphs 4 and 11.
2. City Defendant lacks knowledge or information sufficient to form a belief  
as to the truth of the allegations contained in paragraphs 1, 2, 3, 5, 6, 7, 8, 9, 10, 14, 15,  
16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 30, 31, 32, 33, 35, 36, and 37.
3. Paragraph 12 is a legal assertion that does not require an answer by City  
Defendant but is otherwise denied.

4. City Defendant admits as much of Paragraph 29 as to the City of Rochester but denies information or knowledge sufficient to form a belief as to the remainder of the paragraph.

5. City Defendant denies Paragraph 34 as it relates to Plaintiff's entitlement that Plaintiff be declared first and best lien. City Defendant denies information or knowledge sufficient to form a belief as to the remainder of the paragraph.

6. City Defendant denies each and every allegation contained in the Complaint not expressly admitted herein.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE, DEFENDANT STATES:**

7. The City of Rochester maintains first and best lien priority over all subject properties located in the City of Rochester pursuant to City of Rochester Charter § 9-80.

8. Any foreclosure executed by way of this action would not foreclose the City Defendant's past, current, and future interests on those subject properties.

**WHEREFORE,** Defendant City of Rochester demands:

- A. Judgment granting foreclosure subject to any and all present and future city liens and interests;
- B. Ordering and directing that any proceeds of the foreclosure sale be first applied to any unpaid city invoices, debts, claims, taxes, fines, costs, fees, and judgments concerning the subject properties;
- C. The costs and disbursements of this action; and
- D. Such other and further relief to which the Court may seem just and proper.

Date: March 1, 2024  
Rochester, NY

PATRICK BEATH, CORPORATION COUNSEL

By:

**/s/Michael Furlano**

Michael Furlano, Esq. of Counsel

NYS Bar Number: 5248190

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